

THE HONORABLE TIFFANY M. CARTWRIGHT

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES FIRE INSURANCE
COMPANY, a Delaware corporation;
ENDURANCE AMERICAN INSURANCE
COMPANY, a Delaware corporation;
NAVIGATORS INSURANCE COMPANY, a
New York corporation; and AGRICO SALES,
INC., a Texas corporation,
Plaintiffs,

vs.

OXBO, INC. d/b/a OXBO MEGA
TRANSPORT SOLUTIONS, an Oregon
corporation; and OXBO ENGINEERING,
LLC, an Oregon limited liability company,

Defendants,

vs.

ALEXANDER GOW, INC., an Oregon
corporation and a Washington corporation,
CSL GLOBAL LIMITED d/b/a CSL NORTH
AMERICA, a Texas corporation, and a
Louisiana corporation, WESTERN
TOWBOAT COMPANY, a Washington
corporation,

Third-Party Defendants.

IN ADMIRALTY

Case No. 3:22-cv-05228-TMC

STIPULATION AND [PROPOSED]
ORDER TO CONTINUE CERTAIN
PRE-TRIAL DEADLINES

STIPULATION AND [PROPOSED] ORDER TO CONTINUE
CERTAIN PRETRIAL DEADLINES - 1
Case No. 3:22-cv-05228-TMC

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All the parties to this action jointly ask this Honorable Court to continue the following pre-trial deadlines by one week:

Event	Current Deadline	Proposed New Deadline
Expert Reports	November 10, 2023	November 17, 2023
Rebuttal Reports	December 11, 2023	December 18, 2023

The trial and other pre-trial deadlines shall remain unchanged.

The case involves complicated issues of contractual disputes, lashing plans for heavy industrial equipment transported on navigable waters, marine engineering, historical weather and other issues. This is a discovery intensive case, with documents produced in the range of seventy thousand pages, as well as numerous schematics and calculations. The parties continue to work in good faith on scheduling depositions and gathering relevant documents. This additional time is required for experts to review the data and to issue their initial opinions. The continuance is for one week only and will not affect the trial date. The parties and counsel agree the request for continuance does not result from lack of diligence.

Therefore, the parties respectfully ask that the Scheduling Order be amended to reflect the stipulated deadlines outlined above.

DATED this 9th day of November, 2023.

HOLMES WEDDLE & BARCOTT, P.C.

/s/ Svetlana P. Spivak

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**STIPULATION AND [PROPOSED] ORDER TO CONTINUE
 CERTAIN PRETRIAL DEADLINES - 2**
 Case No. 3:22-cv-05228-TMC

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LINDSAY HART, LLP

/s/ James McCurdy

James McCurdy, WSBA # 40540
*Counsel for Third Party Defendant
Alexander Gow, Inc.*

ORDER

It is so ORDERED.

DATED this 9th day of November, 2023.



Tiffany M. Cartwright
United States District Court Judge

Presented by:

HOLMES WEDDLE & BARCOTT, P.C.

/s/ Svetlana P. Spivak

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MEGA TRANSPORT SOLUTIONS

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**STIPULATION AND [PROPOSED] ORDER TO CONTINUE
CERTAIN PRETRIAL DEADLINES - 4**

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